

# **EXHIBIT 14**

*WINDSOR SECURITIES, LLC VS.  
ARENT FOX LLP, et al.*

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*LAUREN ANTONINO  
February 15, 2018*

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126 East 56th Street, Fifth Floor New York, New York 10022  
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*Original File 116472.TXT  
Min-U-Script® with Word Index*

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 WINDSOR SECURITIES, LLC,

-----X

4 Plaintiff,

5 vs.

6 ARENT FOX LLP, et al.,

7 Defendants,

8 CIVIL ACTION NO. 16-CV-01533 (GBD) (GWG)

-----X

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10 303 Peachtree Street NE  
Atlanta, Georgia

11

12 February 15, 2018  
11:03 a.m.

13

14 Videotaped deposition of LAUREN ANTONINO, taken  
15 on behalf of the Defendants, pursuant to Notice and  
16 agreement of counsel, in accordance with the Federal  
17 Rules of Civil Procedure, before Maureen S. Kreimer,  
18 CCR B-1379, CRR, Notary Public, at the law offices  
19 of Hawkins Parnell.

20

21

22

23 ELLEN GRAUER COURT REPORTING CO. LLC  
126 East 56th Street, Fifth Floor  
24 New York, New York 10022  
212.750.6434  
25 REF: 116472

1 A P P E A R A N C E S :

2

3 Alan L. Frank Law Associates, P.C.

4 On behalf of the Plaintiff

5 135 Old York Road

6 Jenkintown, Pennsylvania 19046

7 BY: ALAN L. FRANK, ESQ.

8 215.935.1000

9

10 Foley & Lardner, LLP

11 On behalf of the Defendants

12 90 Park Avenue

13 New York, New York 10016

14 BY: PETER N. WANG, ESQ.

15 ADAM G. PENCE

16 212.682.7474

17

18 Hawkins Parnell Thackston & Young LLP

19 On behalf of the Witness

20 303 Peachtree Street NE

21 Suite 4000

22 Atlanta, Georgia 30308-3243

23 BY: CHRISTINE L. MAST, ESQ.

24 404.614.7400

25

1 A P P E A R A N C E S : (Cont'd)

2

3 ALSO PRESENT:

4 Mr. Henry Stewart, Videographer

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1 ----- I N D E X -----  
2 WITNESS EXAMINATION BY PAGE  
3 LAUREN ANTONINO MR. WANG 7  
4  
5

6 ----- E X H I B I T S -----

7 DEFENDANTS'	DESCRIPTION	FOR I.D.
8 Exhibit 1	Affidavit of Lauren S. Antonino	38
10 Exhibit 2	Subpoena to Lauren Antonino to produce documents	48
13 Exhibit 3	Billing reports from Antonino firm Plaintiff-069455 - 9601	69
16 Exhibit 4	Confidential submission by Windsor Securities LLC via email to Wayne Thorpe Antonino-083440 - 3460	80
20 Exhibit 5	Email string ending 8-30-16 Subject Attorney Invoices; Plaintiff-084552 - 4553	123

24  
25

## 1 ----- EXHIBITS (Cont'd) -----

2 DEFENDANTS'	3 DESCRIPTION	4 FOR I.D.
5 Exhibit 6	6 Tolling Agreement signed 7 2-13-15 Antonino-016421 - 8 6424	9 142
10 Exhibit 7	11 2-23-16 Letter from Marcus 12 Law Office to Steve Prusky 13 Antonino-016416	14 148
15 Exhibit 8	16 3-22-17 Mutual Release of 17 Claims Plaintiff-087010	18 162
19 Exhibit 9	20 Eugene Houchins III 21 Affidavit Plaintiff-072806 22 - 2811	23 164
24 Exhibit 10	25 Email string ending 8-29-14 Subject Barnes/ Bitter Policy Revised Settlement, CONFIDENTIAL Plaintiff-008243 - 8251	(EXHIBITS TO BE PRODUCED)

1                           ANTONIO

2                           MS. MAST: You see what I'm saying?

3                           MR. WANG: I don't see what you mean. But  
4                           we'll get to the affidavit, and then I'll ask  
5                           specific questions in the context of the  
6                           affidavit.

7                           MS. MAST: Okay.

8                           MR. WANG: Maybe that will help this  
9                           along.

10                          MS. MAST: Okay.

11 BY MR. WANG:

12                          Q. Ms. Antonino, had you, prior to your  
13                          working for Windsor, being retained by Windsor, had  
14                          you had any experience in premium financing for life  
15                          insurance policies?

16                          A. No.

17                          Q. Had you had any experience in litigation  
18                          involving premium financing for life insurance  
19                          products?

20                          A. I had experience involving insurance  
21                          coverage disputes, but not specifically life  
22                          insurance premium financing.

23                          Q. What sorts of insurance coverage disputes  
24                          had you had experience in?

25                          A. Disputes over who's entitled to the death

1 ANTONIO  
2 don't know if it was exactly before or after when I  
3 started working with Windsor, but it could been  
4 before. Yeah, I -- there is one that I'm thinking  
5 of particularly. So I don't know exactly the  
6 timing.

7 Q. So you're thinking of one in particular  
8 that happened fairly recent to the Windsor  
9 experience, either before or after?

A. I think so.

Q. Mm-hmm (affirmative).

12 A. I hadn't thought about it in a while, but  
13 yes.

14 Q. Okay. And how about life settlement?

15 The -- you know what the life settlement industry  
16 is, you know what that --

17       A.     Yes. I had not been involved in the life  
18 settlement industry before.

**19** Q. You had not?

20 A. No, sir.

21 Q. And I think you said you had not been  
22 involved in any case involving premium financing;  
23 correct?

24 A. Yes.

Q. You know what premium financing is?

ANTONIO

2 at and give some advice on eventually. This is way  
3 late in the game.

Q. Mm-hmm (affirmative).

5 A. So it depends on how you define "matter".

6 And there were a variety of things between 2014  
7 until the -- you know, until now.

8           Q.       Okay. So on each time that you worked on,  
9       whether it was the Utah matter, or the Canada  
10      matter, did you open a different billing matter  
11      number for that?

12 A. No. It was really general representation.  
13 I was retained to evaluate whether or not there were  
14 claims against Gene Houchins and that group. And  
15 that was the scope, by definition of my engagement,  
16 specifically in my engagement letter in the outset.  
17 That was the only reason that I was retained.  
18 That's why your client called me.

19                   And in connection with evaluating the  
20 potential claims against Mr. Houchins, I was sent a  
21 whole lot of information about a whole lot of things  
22 so that I could understand what happened.

23                   And then it wasn't until May or June of  
24 2015 that I was expressly asked to become involved  
25 in, you know, other matters, and so I had a revised

ANTONIO

2 engagement letter for that. I think my affidavit  
3 speaks to that, and which had its own limited scope.

4 And then, you know, after that it was a  
5 relationship and, you know, occasionally I was asked  
6 to look at some other things.

7                   So late in the relationship because the  
8 premium financing cases, you know, the -- were --  
9 the California cases that Darin were handling were I  
10 think maybe over then -- I'm not sure really, I'd  
11 have to look at my bills -- and we had decided along  
12 the way not to sue Houchins.

When I started doing some other things, I did at the end start noting what they were, you know, if they were specific for a specific something else, like the Canada matter, or you know, what you guys are doing.

18                   MR. FRANK: I'm going to move to strike or  
19                   limit or somehow address some of the answer --  
20                   I didn't want to interrupt it -- to the extent  
21                   that it implicates what we believe to be  
22                   attorney-client privileged topics and, in  
23                   particular, addressing a decision to sue or not  
24                   sue Mr. Houchins. The Plaintiff most certainly  
25                   does not concede his privilege with respect to

1 | ANTONIO

2 privilege and violates Judge Gorenstein's  
3 order. But I'm not criticizing. I'm just  
4 simply --

5 THE WITNESS: No problem.

6 MR. FRANK: -- registering on the record  
7 our objection to the content of that question  
8 and the answer.

9 | BY MR. WANG:

10 Q. Did you meet -- did you ever meet  
11 Mr. Houchins?

12 A. NO.

13 Q. Did you notice his deposition?

14 A. I know we tried to schedule it. I don't  
15 remember if a notice went out or not, so I'd have to  
16 look at the folder, at the file.

17 Q. And what -- the case settled before you --  
18 before that occurred?

19 A. Yes.

20 Q. So you were going to be -- take his  
21 deposition, but the settlement intervened?

22 A. I think in the course of the discovery  
23 plan there were communications about taking  
24 Houchins' deposition.

Q. Okay. You did review his transcript in

1                   A C K N O W L E D G M E N T  
23       STATE OF                                      )  
4    ) ss.:  
5       COUNTY OF                                     )6  
7                   I, LAUREN ANTONINO, hereby  
8       certify that I have read the transcript of my  
9       testimony taken under oath in my deposition;  
10      that the transcript is a true, complete and  
11      correct record of my testimony, and that the  
12      answers on the record as given by me are true  
13      and correct.

14

15

16   LAUREN ANTONINO  
1718       Signed and subscribed to before  
19       me, this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
20

21

22       \_\_\_\_\_  
23       Notary Public, State of \_\_\_\_\_  
24

25

C E R T I F I C A T E

**STATE OF GEORGIA**

2

## **FULTON COUNTY )**

6

7 I hereby certify that the foregoing transcript was  
8 taken down, as stated in the caption, and the questions  
9 and answers thereto were reduced to the written page  
10 under my direction; that the foregoing pages represent a  
11 true and correct transcript of the evidence given.

12

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14

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This, 27th day of February, 2018.

19

30

21

20

MAUREEN KREIMER, CCR-B-1379  
Notary Public in and for the  
State of Georgia. My Commission  
Expires August 14, 2020.

Maureen Kneen

1                   \*\*\*ERRATA\*\*\*

2                   ELLEN GRAUER COURT REPORTING CO. LLC  
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4                   New York, New York 10022  
5                   212-750-6434

5                   NAME OF CASE: WINDSOR SECURITIES VS. ARENT FOX  
6                   DATE OF DEPOSITION: February 15, 2018  
7                   NAME OF WITNESS: LAUREN ANTONINO

7                   PAGE LINE     FROM           TO           REASON

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20      \_\_\_\_\_|\_\_\_\_\_|\_\_\_\_\_|\_\_\_\_\_|\_\_\_\_\_

21                   \_\_\_\_\_

22                   Subscribed and sworn before me

23                   this \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_.

24                   \_\_\_\_\_                  \_\_\_\_\_

25                   (Notary Public)                  My Commission Expires: